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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	Mag. Case Number: '07 MJ 2874
Plaintiff,	)	COMPLAINT FOR VIOLATION OF
v.	)	Title 21, U.S.C., Sections 952 and 960
	)	Importation of a Controlled Substance
SALAHSHOOR, Emad	)	
Defendant,	)	

The undersigned complaint being duly sworn states:

On or about December 11, 2007, within the Southern District of California, Emad SALAHSHOOR did intentionally import approximately 1.45 kilograms of methamphetamine, a Schedule II Controlled Substance, into the United States from a place outside thereof; in violation of Title 21, United States Code, Sections 952 and 960.

And the complainant states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.

Robert Sanchez
Special Agent,
IMMIGRATION AND CUSTOMS ENFORCEMENT

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 11th DAY OF DECEMBER, 2007.

MAGISTRATE JUDGE

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STATEMENT OF FACTS

On December 11, 2007, at approximately 00:00, Emad SALAHSHOOR entered the United States from the Republic of Mexico at the San Ysidro Port of Entry, San Diego, California. SALAHSHOOR was the operator and Jerry SANDERS the passenger of a 1984 Chevy Van bearing California license 5KUV604.

During primary vehicle inspections, the US Customs and Border Protection Officer received a computer-generated referral for a 1984 Chevy Van bearing CAUS/5KUV604. The driver and passenger both claimed United States citizenship. Both gave a negative Customs declaration. The vehicle and occupants were escorted to the secondary inspection area.

Both occupants of the vehicle were escorted to the Security office pending completion of the secondary vehicle inspection. It was at this time that passenger SANDERS (DOB/11-15-1942) experienced heart trouble. Paramedics responded and transported SANDERS to Scripps Chula Vista hospital.

CBPO Officers conducted the secondary inspection on the Chevy Van and discovered five (5) packages concealed within the passenger side door of the vehicle. A presumptive test of one of the packages was positive for methamphetamine. The total weight of the methamphetamine was 1.45 kilograms.

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At approximately 01:30 hours, SALAHSHOOR was informed that methamphetamine was found in the vehicle and he was under arrest. SALAHSHOOR waived his rights per Miranda and was willing to answer questions.

In substance, SALAHSHOOR stated that he believed he was smuggling people, that's what he was told. He had no knowledge of methamphetamine being concealed within the vehicle. He has no current address and no means of support at this time. He did not know any of the people involved, including SANDERS, prior to today. He initially got in a Van in Los Angeles with SANDERS, Jimmy LNU, Felipe LNU, and Beto LNU. Jimmy told him that he had work for him. They then proceeded to drive into Tijuana, Mexico. He claims he drove the load vehicle into the United States out of fear of retaliation to him or his family if he did not comply.

SALAHSHOOR was arrested and charged with violation of Title 21 USC 952, 960, Importation of a Controlled Substance, and was booked into the Metropolitan Correction Center, San Diego, CA.